

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

HMONG COLLEGE PREP ACADEMY, Plaintiff, v. WOODSTOCK CAPITAL, LLC AND CARL REINER, ¹ Defendants.	Civil Action No. 0:21-cv-01721-PAM-BRT PLAINTIFF’S MOTION TO REMAND
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Pursuant to 28 U.S.C. § 1447(c), Plaintiff Hmong College Prep Academy hereby moves and respectfully requests that the Court remand this action to the Second Judicial District of Minnesota. The notice of removal filed by Defendants Woodstock Capital, LLC and Clark Reiner fails to adequately plead the citizenship of Defendant Woodstock Capital, LLC, and therefore Defendants have failed to plead diversity of citizenship under 28 U.S.C. § 1332(a). Plaintiff’s Motion is based upon all of the files, records, and proceedings on file, the memorandum of law and supporting documents submitted herewith, and the arguments of counsel.

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¹ In the caption and body of their Notice of Removal, Defendants erroneously list Defendant Clark Reiner’s first name as “Carl” instead of “Clark.”

Dated: August 18, 2021

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